

EXHIBIT A

Local Patent Rule 11: Joint Claim Terms Chart
Signify N. Am. Corp. et al. v. Satco Products, Inc.

Joint Disputed Claim Terms or Phrases:

U.S. Patent No. 7,348,604

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
<p>“fastening means”¹ (proposed by Signify) (claim 1)</p> <p>“fastening means for detachably coupling the housing element to the heat dissipation element” (proposed by Satco) (claim 1)</p>	<p>Function: fastening</p> <p>Structure: fastening means 450 as described in Figure 4 and at 5:18-24, 7:25-26, and 7:44-51; mechanical fasteners for example, screws, bolts rivets or the like; magnetic mounting systems; adhesives for example, pressure sensitive tape, glue or epoxy or the like; and equivalents thereof</p>	<p>a fastener</p>	<p>Infringement contentions²: Ex. A-1, pp. 6-7; Ex. A-2, pp. 5-6; Ex. A-3, pp. 6-7; Ex. A-4, pp. 5-7; Ex. A-5, pp. 5-7; Ex. A-6, pp. 5-6; Ex. A-7, pp. 5-6; Ex. A-8, pp. 7; Ex. A-9, pp. 5-6; Ex. A-10, pp. 6-7; Ex. A-11, pp. 4-5; Ex. A-12, pp. 4-5; Ex. A-13, pp. 4-5; Ex. A-14, pp. 5-7; Ex. A-15, pp. 6-8; Ex. A-16, pp. 6-8; Ex. A-17, pp. 5-6; Ex. A-18, pp. 5-6; Ex. A-19, pp. 6-7; Ex. A-20, pp. 5-6.</p> <p>Invalidity Contentions³: <i>see, e.g.,</i> Chart A-1 at pp. 15-16; Chart A-2 at pp. 6-9; Chart A-</p>

¹ Signify proposes that the proper term for construction is “fastening means” not “fastening means for detachably coupling the housing element to the heat dissipation element.”

² As used herein “Infringement Contentions” refers to Signify North America Corporation and Signify Holding B.V.’s Local Patent Rule 6 Disclosures, dated June 26, 2020.

³ As used herein “Invalidity Contentions” refers to Satco’s Invalidity Contentions, dated September 9, 2020.

			3 at pp. 8-9; Chart A-4 at pp. 6-8; Chart A-5 at pp. 5-6; Chart A-6 at pp. 5-6.
“optically coupled” (claim 2)	Plain and ordinary meaning	joined together such that the optical element can manipulate the light	<p>Infringement contentions: Ex. A-1, pp. 7-7; Ex. A-2, pp. 6-7; Ex. A-3, pp. 7-8; Ex. A-5, pp. 7-8; Ex. A-6, pp. 7; Ex. A-7, pp. 6-7; Ex. A-8, pp. 8; Ex. A-9, pp. 6-7; Ex. A-10, pp. 7-8; Ex. A-11, pp. 6; Ex. A-12, pp. 6; Ex. A-13, pp. 5-6; Ex. A-14, pp. 7-8; Ex. A-16, pp. 9; Ex. A-17, pp. 6-7; Ex. A-20, pp. 7.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart A-1 at p. 17; Chart A-2 at pp. 9-10; Chart A-3 at pp. 10-11; Chart A-4 at pp. 8-9; Chart A-5 at pp. 6-7; Chart A-6 at pp. 6-7.</p>
“integrally formed” (claim 3)	Plain and ordinary meaning	formed as a single unit from the same material	<p>Infringement contentions: Ex. A-1, pp. 8-9; Ex. A-2, pp. 7-8; Ex. A-3, pp. 8-9; Ex. A-5, pp. 8-10; Ex. A-6, pp. 7-8; Ex. A-7, pp. 7-8; Ex. A-8, pp. 9; Ex. A-9, pp. 7-8; Ex. A-10, pp. 8-9; Ex. A-11, pp. 6-7; Ex. A-12, pp. 7; Ex. A-13, pp. 6-7; Ex. A-14, pp. 8-9; Ex. A-</p>

			<p>16, pp. 9-10; Ex. A-17, pp. 7-8; Ex. A-20, pp. 7-8.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart A-1 at pp. 17-18; Chart A-2 at p. 10; Chart A-3 at p. 11; Chart A-4 at pp. 9-10; Chart A-5 at p. 7; Chart A-6 at pp. 7-8.</p>
--	--	--	--

U.S. Patent No. 7,358,929

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
"diffuser disposed <u>over the housing</u> " (claim 17)	Plain and ordinary meaning	diffuser is placed on top of the housing/enclosure	<p>Infringement contentions: Ex. B-1, pp. 8-9; Ex. B-2, pp. 7-9; Ex. B-3, pp. 4-6.</p> <p>Invalidity Contentions: <i>see, e.g.,</i> Chart B-1 at pp. 4-5; Chart B-2 at p. 4; Chart B-3 at p. 3; Chart B-4 at pp. 4-5; Chart B-5 at pp. 3-4; Chart B-6 at pp. 3-5; Chart B-7 at p. 4.</p>
"a reflector interior to the housing <u>for providing a consistent level of light output to different portions of the diffuser</u> " (claims 19, 63)	Plain and ordinary meaning, or in the alternative a reflector interior to the housing for providing a homogenized and diffused light output from different portions of the diffuser	Indefinite	<p>Infringement contentions: Ex. B-1, pp. 11-12, 21-22; Ex. B-2, pp. 11, 25; Ex. B-3, pp. 8-9, 18-19.</p> <p>Invalidity Contentions: <i>see, e.g.,</i> Chart B-1 at pp. 5, 9; Chart B-2 at pp. 5, 7; Chart B-3 at pp. 4, 8; Chart B-4 at pp. 6, 10; Chart B-5 at pp. 6, 9; Chart B-6 at pp. 6-7, 11; Chart B-7 at pp. 5, 8.</p>

<p>“disposed in an architectural environment” (proposed by Signify) (claim 23)</p> <p>“an architectural environment” (proposed by Satco) (claim 23)</p>	<p>mounted or integrated into walls, ceilings, doors, windows or floors</p>	<p>Indefinite</p>	<p>Infringement contentions: Ex. B-1, pp. 12; Ex. B-2, pp. 12-13; Ex. B-3, pp. 9-10.</p> <p>Invalidity Contentions: <i>see, e.g.,</i> Chart B-1 at p. 6; Chart B-2 at pp. 5-6; Chart B-3 at p. 4; Chart B-4 at p. 6; Chart B-5 at pp. 6-7; Chart B-6 at p. 7; Chart B-7 at pp. 5-6.</p>
<p>“a geometric shape” (claim 61)</p>	<p>Plain and ordinary meaning</p>	<p>a polygon (rectangle, triangle, etc.), not an irregular shape</p>	<p>Infringement contentions: Ex. B-1, pp. 19; Ex. B-2, pp. 21-22; Ex. B-3, pp. 15-16.</p> <p>Invalidity Contentions: <i>see, e.g.,</i> Chart B-1 at pp. 7-8; Chart B-2 at p. 7; Chart B-3 at pp. 6-7; Chart B-4 at pp. 8-9; Chart B-6 at pp. 8-10.</p>

U.S. Patent No. 6,972,525

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
"self-inductance" (claim 1)	An inductive circuit component distinct from the claimed transformer	plain meaning, i.e., the property of an electric circuit whereby an electromotive force is induced in that circuit by a change of current in the circuit	<p>Infringement contentions: Ex. C-1, pp. 8-10, 17-18; Ex. C-2, pp. 4-6; Ex. C-3, pp. 4-6; Ex. C-4, pp. 4-6; Ex. C-5, pp. 5-9; Ex. C-6, pp. 4-6; Ex. C-7, pp. 5-7, 12-14; Ex. C-8, pp. 5-8; Ex. C-9, pp. 5-8; Ex. C-10, pp. 5-8; Ex. C-11, pp. 4-6.</p> <p>Invalidity Contentions: <i>see, e.g.,</i> Chart C-1 at pp. 5-6; Chart C-2 at pp. 3-4; Chart C-3 at pp. 4-6; Chart C-4 at pp. 3-4.</p>

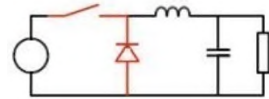
U.S. Patent No. 8,070,328

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
"heatsink / heat sink" (claims 1, 2, 10, 16, 19)	Plain and ordinary meaning	a heat-conductive device that absorbs or dissipates unwanted heat and reduces heat in the LED downlight fixture	<p>Infringement contentions: Ex. D-1, pp. 3-4, 14-15, 20-21; Ex. D-2, pp. 2-3, 15-16, 21-22; Ex. D-3, pp. 2-3, 16-17, 22-23; Ex. D-4, pp. 3-4, 16-17, 22-23; Ex. D-5, pp. 3-4, 19-20, 25-27; Ex. D-6, pp. 2-3, 17, 22-23; Ex. D-7, pp. 3, 16, 21-22; Ex. D-8, pp. 2-3, 9, 14-15, 20, 26-27, 34; Ex. D-9, pp. 3, 15, 21-22; Ex. D-10, pp. 2-3, 15-16, 21-22; Ex. D-11, pp. 3, 17-18, 23-25; Ex. D-12, pp. 6-7, 19, 24-26, 32-33; Ex. D-13, pp. 2-3, 14-15; Ex. D-14, pp. 2-3, 16-17.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart D-1 at pp. 4-5, 14, 20-21, 46-47, 65-66; Chart D-2 at pp. 3-4, 10, 21-22, 42-43, 55-56.</p>
"engaging" (claim 5)	Plain and ordinary meaning	interlocked with	<p>Infringement contentions: Ex. D-1, pp. 10-11; Ex. D-2, pp. 9-10; Ex. D-3, pp. 9-10; Ex. D-4, pp. 10-11; Ex. D-5,</p>

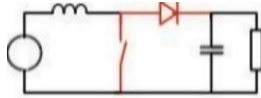
			<p>pp. 12-13; Ex. D-6, pp. 9-10; Ex. D-7, pp. 9-10; Ex. D-8, pp. 9-11; Ex. D-9, pp. 9-10; Ex. D-10, pp. 9-10; Ex. D-11, pp. 9-11; Ex. D-12, pp. 13-15; Ex. D-13, pp. 10-11; Ex. D-14, pp. 9-10.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart D-1 at pp. 15-16; Chart D-2 at pp. 13-14.</p>
<p>“said heat sink <u>extending radially</u> above an outer surface of said first reflector” (claim 10)</p>	<p>Plain and ordinary meaning</p>	<p>having radial extensions</p>	<p>Infringement contentions: Ex. D-1, pp. 20-21; Ex. D-2, pp. 21-22; Ex. D-3, pp. 22-23; Ex. D-4, pp. 22-23; Ex. D-5, pp. 25-27; Ex. D-6, pp. 22-23; Ex. D-7, pp. 21-22; Ex. D-8, pp. 20; Ex. D-9, pp. 21-22; Ex. D-10, pp. 21-22; Ex. D-11, pp. 23-25; Ex. D-12, pp. 24-26; Ex. D-13, pp. 20-21; Ex. D-14, pp. 22-23.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart D-1 at pp. 34-35; Chart D-2 at pp. 30-32.</p>
<p>“preselected spaced distance” (claim 19)</p>	<p>Plain and ordinary meaning</p>	<p>distance chosen in advance to achieve optimal cut-off, reduced glare and increased light efficiency</p>	<p>Infringement contentions: Ex. D-12, pp. 34-36.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart D-1 at pp. 68-69; Chart D-2 at pp. 58-59.</p>

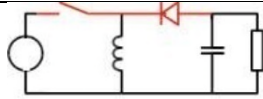
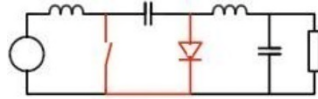
<p>“one of above a lowermost edge reflector or beneath said lowermost edge of said reflector” (claim 19)</p>	<p>Plain and ordinary meaning</p>	<p>Indefinite</p>	<p>Infringement contentions: Ex. D-12, pp. 34-36.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart D-1 at pp. 68-69; Chart D-2 at pp. 58-59.</p>
--	-----------------------------------	-------------------	--

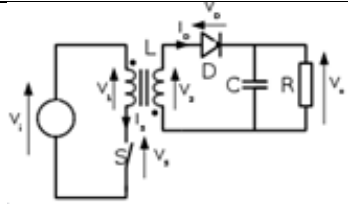
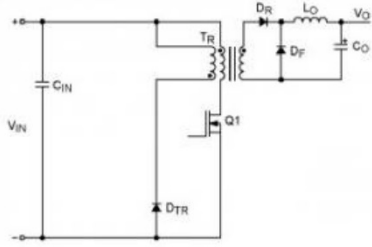
U.S. Patent No. 7,256,554

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
“without monitoring or regulating a first voltage or a first current” (claims 1, 6, 46, 51)	Plain and ordinary meaning	without: <ul style="list-style-type: none"> • directly or indirectly monitoring a first voltage • directly or indirectly monitoring a first current • directly or indirectly regulating a first voltage • directly or indirectly regulating a first current 	Infringement contentions: Ex. G-1, pp. 9-15, 22, 38-40; Ex. G-2, pp. 6-15, 23, 38-45, 57; Ex. G-3, pp. 5-11, 17, 26-29, 40; Ex. G-4, pp. 5-6, 16, 26-28, 39; Ex. G-5, pp. 5-6, 16, 26-28, 39; Ex. G-6, pp. 7-14, 37, 56-66, 87. Invalidity Contentions: <i>see, e.g.</i> , Chart G-1 at pp. 5-7, 12, 25, 27; Chart G-2 at pp. 4-8, 13, 25, 27; Chart G-3 at pp. 3-7, 14-15, 28, 30; Chart G-4 at pp. 7-10, 15, 28, 30; Chart G-5 at pp. 7-8, 15-16, 28, 30-31; Chart G-6 at pp. 15-16, 19.
“buck converter” (claims 2, 6, 47, 51)	Plain and ordinary meaning ⁴	Plain meaning, i.e. a conventional DC-DC converter typically having the following topology: 	Infringement contentions: Ex. G-1, pp. 19-20, 23, 43-44, 50-52; Ex. G-2, pp. 21, 24, 50-51, 56-58; Ex. G-3, pp. 15, 18, 34-35, 39-41; Ex. G-4, 13-14, 17, 33-35, 39-40; Ex. G-5, pp. 13-14, 17, 34-35, 39-40; Ex. G-6, pp. 23-25, 28, 74-75,

⁴ For all “converter” terms for the 554 patent, Signify does not contend there is a dispute as both parties agree to plain and ordinary meaning. Rather, Signify takes issue with Satco’s unnecessary description of “conventional” converters and “typical[]” topologies.

			87-88. Invalidity Contentions: <i>see, e.g.,</i> Chart G-1 at pp. 10-11, 13, 26-27, 29; Chart G-2 at pp. 11-12, 14, 26-27, 29; Chart G-3 at pp. 12-13, 15, 29-30, 32; Chart G-4 at pp. 13-14, 16, 29-30, 32; Chart G-5 at pp. 14-17, 29-30, 32.
“boost converter” (claims 2, 6, 47, 51)	Plain and ordinary meaning ⁵⁶	Plain meaning, i.e. a conventional DC-DC converter, typically having the following topology: 	Infringement contentions: Ex. G-1, pp. 19-20, 23, 43-44, 50-52; Ex. G-2, pp. 21, 24, 50-51, 56-58; Ex. G-3, pp. 15, 18, 34-35, 39-41; Ex. G-4, 13-14, 17, 33-35, 39-40; Ex. G-5, pp. 13-14, 17, 34-35, 39-40; Ex. G-6, pp. 23-25, 28, 74-75, 87-88. Invalidity Contentions: <i>see, e.g.,</i> Chart G-1 at pp. 10-11, 13, 26-27, 29; Chart G-2 at pp. 11-12, 14, 26-27, 29; Chart G-3 at pp. 12-13, 15, 29-30, 32; Chart G-4 at pp. 13-14, 16, 29-30, 32; Chart G-5 at pp. 14-17, 29-30, 32.
“buck-boost converter” (claims 2, 6, 47, 51)	Plain and ordinary meaning ⁵⁶	Plain meaning, i.e. a conventional DC-DC converter typically having the following topology:	Infringement contentions: Ex. G-1, pp. 19-20, 23, 43-44, 50-52; Ex. G-2, pp. 21, 24, 50-51, 56-58; Ex. G-3, pp. 15, 18, 34-35, 39-41; Ex. G-4, 13-14, 17, 33-35, 39-40; Ex. G-5,

			<p>pp. 13-14, 17, 34-35, 39-40; Ex. G-6, pp. 23-25, 28, 74-75, 87-88.</p> <p>Invalidity Contentions: <i>see, e.g.,</i> Chart G-1 at pp. 10-11, 13, 26-27, 29; Chart G-2 at pp. 11-12, 14, 26-27, 29; Chart G-3 at pp. 12-13, 15, 29-30, 32; Chart G-4 at pp. 13-14, 16, 29-30, 32; Chart G-5 at pp. 14-17, 29-30, 32.</p>
“CUK converter” (claims 2, 6, 47, 51)	Plain and ordinary meaning ⁵⁶	<p>Plain meaning, i.e. a conventional DC-DC converter typically having the following topology:</p> 	<p>Infringement contentions: Ex. G-1, pp. 19-20, 23, 43-44, 50-52; Ex. G-2, pp. 21, 24, 50-51, 56-58; Ex. G-3, pp. 15, 18, 34-35, 39-41; Ex. G-4, 13-14, 17, 33-35, 39-40; Ex. G-5, pp. 13-14, 17, 34-35, 39-40; Ex. G-6, pp. 23-25, 28,</p> <p>Invalidity Contentions: <i>see, e.g.,</i> Chart G-1 at pp. 10-11, 13, 26-27, 29; Chart G-2 at pp. 11-12, 14, 26-27, 29; Chart G-3 at pp. 12-13, 15, 29-30, 32; Chart G-4 at pp. 13-14, 16, 29-30, 32; Chart G-5 at pp. 14-17, 29-30, 32.</p>
“flyback converter” (claims 2, 6, 47, 51)	Plain and ordinary meaning ⁵⁶	<p>Plain meaning, a conventional DC-DC converter, typically having the following topology:</p>	<p>Infringement contentions: Ex. G-1, pp. 19-20, 23, 43-44, 50-52; Ex. G-2, pp. 21, 24, 50-51, 56-58; Ex. G-3, pp. 15, 18, 34-35, 39-41; Ex. G-4, 13-</p>

			<p>14, 17, 33-35, 39-40; Ex. G-5, pp. 13-14, 17, 34-35, 39-40; Ex. G-6, pp. 23-25, 28, 74-75, 87-88.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart G-1 at pp. 10-11, 13, 26-27, 29; Chart G-2 at pp. 11-12, 14, 26-27, 29; Chart G-3 at pp. 12-13, 15, 29-30, 32; Chart G-4 at pp. 13-14, 16, 29-30, 32; Chart G-5 at pp. 14-17, 29-30, 32.</p>
“forward converter” (claims 2, 6, 47, 51)	Plain and ordinary meaning ⁵⁶	<p>Plain meaning, a conventional DC-DC converter, typically having the following topology:</p> 	<p>Infringement contentions: Ex. G-1, pp. 19-20, 23, 43-44, 50-52; Ex. G-2, pp. 21, 24, 50-51, 56-58; Ex. G-3, pp. 15, 18, 34-35, 39-41; Ex. G-4, 13-14, 17, 33-35, 39-40; Ex. G-5, pp. 13-14, 17, 34-35, 39-40; Ex. G-6, pp. 23-25, 28, 74-75, 87-88.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart G-1 at pp. 10-11, 13, 26-27, 29; Chart G-2 at pp. 11-12, 14, 26-27, 29; Chart G-3 at pp. 12-13, 15, 29-30, 32; Chart G-4 at pp. 13-14, 16, 29-30, 32; Chart G-5 at pp. 14-17, 29-30, 32.</p>
“without using any feedback information relating to the at least one first LED” (claims 7, 52)	Plain and ordinary meaning	without directly or indirectly using any feedback information relating to the at	<p>Infringement contentions: Ex. G-1, pp. 27-32, 52-53; Ex. G-2, pp. 29-34, 62-68; Ex. G-</p>

		least one first LED	<p>3, pp. 22-23, 41-43; Ex. G-4, pp. 21-22, 41-42; Ex. G-5, pp. 21-22, 41-42; Ex. G-6, pp. 39-49, 93-103.</p> <p>Invalidity Contentions: <i>see</i>, e.g., Chart G-1 at pp. 13-24, 29; Chart G-2 at pp. 14-24, 29; Chart G-3 at pp. 16-27, 32; Chart G-4 at pp. 16-27, 32; Chart G-5 at pp. 17-27, 32-33.</p>
--	--	---------------------	--

U.S. Patent No. 7,352,138

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
<p>“controller” (claims 1-5, 7, 9-15, 18, 20)</p>	<p>Plain and ordinary meaning</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p><u>Claims 1-2</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and</p>	<p>This is a “means-plus-function” term pursuant to § 112, ¶ 6.</p> <p><u>Claims 1-2</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4</p> <p>(b) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in</p>	<p>Infringement contentions:</p> <p>Ex. E-1, pp. 2-10, 10-11, 14-18, 20-23, 24-26, 26-31; Ex. E-2, pp. 2-14, 14, 17-23, 27-20, 30-38; Ex. E-3, pp. 2-10, 10, 13-17, 20-21, 22-26, 27-30; Ex. E-4, pp. 2-13, 13, 16-20, 25-27, 28-33, 33-37; Ex. E-5, pp. 2-11, 11, 13-19, 21-23, 23-30-33; Ex. E-6, pp. 2-9, 9, 12-17, 19-22, 23-27, 27-30; Ex. E-7, pp. 2-8, 8, 10-12, 12-13, 13-16, 16-19; Ex. E-8, pp. 2-17, 17-18, 20-28, 34-38, 38-41, 41-47; Ex. E-9, pp. 3-8, 8-9, 13, 13-14, 14-16, 16-19; Ex. E-10, pp. 3-8, 8, 8-12, 13, 13-14, 15; Ex. E-11, pp. 2-14, 14-16, 17-21, 22-25, 26-28, 33-34.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart E-1 at pp. 3-34, 40-69, 72-87; Chart E-2 at pp. 5-15, 17-36, 39-68; Chart E-3 at pp. 4-14, 16-63; Chart E-4 at pp. 5-27; Chart E-5 at pp. 5-13, 15-82; Chart E-6 at pp. 5-17, 19-82; Chart E-7 at pp. 5-</p>

	<p>accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claims 3, 5-8</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal 	<p>FIG. 6; or</p> <p>(c) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50</p> <p>and structural equivalents thereof.</p> <p><u>Claims 3, 5-8</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • provide an essentially non-varying power to the at least one LED over a significant range of operation of the user interface 	<p>16, 20-79; Chart E-8 at pp. 1-4.</p>
--	--	---	---

	<ul style="list-style-type: none"> • provide an essentially non-varying power to the at least one LED over a significant range of operation of the user interface <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as shown in FIGS. 3 and 4 and accompanying discussion in the specification;</p> <p>(b) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(c) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry) and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, see '138 patent at 3:12-4:19,</p>	<p>Structure: the components of rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4 and structural equivalents thereof.</p> <p><u>Claim 4</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • provide the essentially non-varying power to the at least one LED over a significant range of operation of the user interface notwithstanding variations in the duty cycle of the power-related signal <p>Structure: the components of</p>	
--	--	---	--

	<p>6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 4</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • provide the essentially non-varying power to the at least one LED over a significant range of operation of the user interface notwithstanding variations in the duty cycle of the power-related signal <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass</p>	<p>rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4</p> <p>and structural equivalents thereof.</p> <p><u>Claims 9, 20-22</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in</p>	
--	---	---	--

	<p>filter 408 and DC converter 402 as shown in FIGS. 3 and 4 and accompanying discussion in the specification;</p> <p>(b) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(c) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry) and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claims 9, 20-22</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source 	<p>FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50</p> <p>and structural equivalents thereof.</p> <p><u>Claim 10</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface 	
--	---	---	--

	<p>that provides signals other than a standard A.C. line voltage</p> <ul style="list-style-type: none"> • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p>	<ul style="list-style-type: none"> • variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50</p> <p>and structural equivalents thereof.</p> <p><u>Claim 11</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals 	
--	---	--	--

	<p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 10</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface • variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal <p>Structure: may comprise any</p>	<p>other than a standard A.C. line voltage</p> <ul style="list-style-type: none"> • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, wherein the at least one parameter of the light that is variably controlled by the at least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light <p>Structure: INDEFINITE; alternatively, either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC</p>	
--	--	--	--

	<p>of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 11</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage 	<p>converter 402 and adjustment circuit that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50 and either '399 patent at (i) 15:40-56 or (ii) 15:40-56 and 16:6-39 or (iii) 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents thereof.</p> <p><u>Claim 12</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal 	
--	---	---	--

	<ul style="list-style-type: none"> • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, wherein the at least one parameter of the light that is variably controlled by the at least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and</p>	<ul style="list-style-type: none"> • variably control at least two different parameters of the light generated by the at least one LED in response to operation of the user interface. <p>Structure: INDEFINITE; alternatively, either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50, 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents thereof.</p> <p><u>Claim 13</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an 	
--	--	--	--

	<p>accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 12</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least one parameter 	<p>alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</p> <ul style="list-style-type: none"> • provide power to the at least one LED based on the power-related signal • variably control at least an intensity and a color of the light simultaneously in response to operation of the user interface <p>Structure: INDEFINITE; alternatively, either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50, 15:40-56, 16:6-39</p>	
--	--	---	--

	<p>of light generated by the at least one LED in response to operation of the user interface</p> <ul style="list-style-type: none"> • variably control at least two different parameters of the light generated by the at least one LED in response to operation of the user interface. <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, see '138 patent at 3:12-4:19,</p>	<p>and 20:30-54</p> <p>and structural equivalents thereof.</p> <p><u>Claim 14</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least an intensity and a color temperature of the white light simultaneously in response to operation of the user interface <p>Structure: INDEFINITE; alternatively, either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit that are shown in FIG. 6; or</p>	
--	--	--	--

	<p>6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 13</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface • variably control at least two different parameters of the light generated by the at least one LED in response to operation of the user interface 	<p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50, 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents thereof.</p> <p><u>Claims 15, 17-18</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least the intensity and the color temperature of the essentially white light in response to operation 	
--	---	---	--

	<ul style="list-style-type: none"> • variably control at least an intensity and a color of the light simultaneously in response to operation of the user interface <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 14</u></p> <p>Functions:</p>	<p>of the user interface so as to approximate light generation characteristics of an incandescent light source</p> <p>Structure: INDEFINITE; alternatively, either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50, 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents thereof.</p>	
--	--	--	--

	<ul style="list-style-type: none">• receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage• provide power to the at least one LED based on the power-related signal• variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface• variably control at least two different parameters of the light generated by the at least one LED in response to operation of the user interface• variably control at least an intensity and a color temperature of the white light simultaneously in response to operation of the user interface		
--	---	--	--

	<p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claims 15, 17-18</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage 		
--	---	--	--

	<ul style="list-style-type: none"> • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface • variably control at least two different parameters of the light generated by the at least one LED in response to operation of the user interface • variably control at least an intensity and a color temperature of the white light simultaneously in response to operation of the user interface • variably control at least the intensity and the color temperature of the essentially white light in response to operation of the user interface 		
--	--	--	--

	<p>so as to approximate light generation characteristics of an incandescent light source</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p>		
“alternating current (A.C.) power source that provides signals other	power source that provides two or more alternating current (A.C.) signals, each	A.C. power source that provides two or more A.C. signals but does not provide	Infringement contentions: Ex. E-1, pp. 3-7, 38-45; Ex. E-2, pp. 3-6, 46-57; Ex. E-3,

than a standard A.C. line voltage” (claims 1, 33)	being other than a sinusoidal wave at a standard frequency and amplitude	standard A.C. line voltage.	pp. 2-6, 36-44; Ex. E-4, pp. 2-6, 43-52; Ex. E-5, pp. 4-7, 33-49; Ex. E-6, pp. 3-6, 38-45; Ex. E-7, pp. 3-6, 23-28; Ex. E-8, pp. 4-8; 59-72; Ex. E-9, pp. 4-8, 23-27; Ex. E-10, pp. 4-8, 21-24; Ex. E-11, pp. 2-12. Invalidity Contentions: <i>see, e.g.,</i> Chart E-1 at pp. 3-7, 88-89; Chart E-2 at pp. 5-15, 75; Chart E-3 at pp. 4-14, 67; Chart E-4 at pp. 5-7, 28; Chart E-5 at pp. 5-13, 94-95; Chart E-6 at pp. 5-17, 93; Chart E-7 at pp. 5-16, 84; Chart E-8 at pp. 1-2, 5.
“A.C. Dimmer Circuit” / “(A.C.) dimmer circuit” / “alternating current (A.C.) dimmer circuit” (claims 2, 3, 6, 9, 17, 34)	a circuit that provides an alternating current (A.C.) dimming signal	Plain meaning	Infringement contentions: Ex. E-1, pp. 10-11, 11-14, 45-48; Ex. E-2, pp. 14, 14-17, 57-59; Ex. E-3, pp. 10, 10-13, 44-45; Ex. E-4, pp. 13, 13-16, 52-55; Ex. E-5, pp. 11, 11-13, 49-51; Ex. E-6, pp. 10, 10-12, 45-48; Ex. E-7, pp. 8, 8-10, 28-29; Ex. E-8, pp. 17-18, 18-20, 73-76; Ex. E-9, pp. 8-9, 9-13, 27-28; Ex. E-10, pp. 8-12, 24-25; Ex. E-11, pp. 14-16, 17, 32-33. Invalidity Contentions: <i>see, e.g.,</i> Chart E-1 at pp. 8-9, 34-

			40, 45-48, 69-72, 89; Chart E-2 at pp. 15-27, 36-39, 41-46, 61, 75; Chart E-3 at pp. 14-27, 36-37, 39-44, 56, 67-68; Chart E-4 at pp. 5-10, 11-18, 26, 28; Chart E-5 at pp. 13-25, 47-48, 51-56, 69, 95; Chart E-6 at pp. 17-30, 44-54, 81, 93-94; Chart E-7 at pp. 16-32, 41-49, 78, 84; Chart E-8 at pp. 2, 5-6.
“power circuitry” (claims 20, 21)	<p>Plain and ordinary meaning</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Function: provide at least the power to the at least one LED based on the varying power-related signal</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown</p>	<p>This is a “means-plus-function” term pursuant to § 112, ¶ 6.</p> <p>Function: provide at least the power to the at least one LED based on the varying power-related signal</p> <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4</p> <p>(b) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(c) the components of power circuitry 108 that are shown in FIG. 8</p>	<p>Infringement contentions:</p> <p>Ex. E-1, pp. 31-34, 37-38; Ex. E-2, pp. 39-40, 40-42; Ex. E-3, pp. 30-31, 31-32; Ex. E-4, pp. 37-38, 38-40; Ex. E-5, pp. 33-34, 34-38; Ex. E-6, pp. 31-33, 33-34; Ex. E-7, pp. 18-19, 19-21; Ex. E-8, pp. 47-50, 50-53; Ex. E-9, pp. 18-19, 19-20; Ex. E-10, pp. 16, 16-18.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart E-1 at pp. 77-87; Chart E-2 at pp. 67-68; Chart E-3 at pp. 62-63; Chart E-4 at pp. 5-7, 11-18, 27; Chart E-5 at pp. 74-82; Chart E-6 at pp. 46-55, 82; Chart E-7 at pp. 42-49, 79; Chart E-8 at p. 4.</p>

	<p>in FIG. 7, FIG. 8 and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p>	and structural equivalents thereof.	
<p>“adjustment circuit” (claims 20, 22)</p>	<p>Plain and ordinary meaning</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Function: variably control the at least one parameter of light based on the varying power-related signal</p> <p>Structure: adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification and/or structural equivalents thereof.</p>	<p>This is a “means-plus-function” term pursuant to § 112, ¶ 6</p> <p>Function: variably control the at least one parameter of light based on the varying power-related signal</p> <p>Structure: the components of adjustment circuit 208 that are shown in FIG. 6</p> <p>and structural equivalents thereof.</p>	<p>Infringement contentions: Ex. E-1, pp. 31-34, 37-38; Ex. E-2, pp. 36-38, 46; Ex. E-3, pp. 27-30, 35; Ex. E-4, pp. 33-37, 43; Ex. E-5, pp. 30-33, 41; Ex. E-6, pp. 27-31, 37-38; Ex. E-7, pp. 16-18, 23; Ex. E-8, pp. 41-47, 58; Ex. E-9, pp. 16-18, 23; Ex. E-10, pp. 15-16, 20-21.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart E-1 at pp. 74-88; Chart E-2 at pp. 62-68, 72-75; Chart E-3 at pp. 57-67; Chart E-4 at pp. 11-18, 27-28; Chart E-5 at pp. 70-82, 92-94; Chart E-6 at pp. 46-55, 82, 88-93; Chart E-7 at pp. 42-49, 78-79, 84; Chart E-8 at pp. 4-5.</p>

<p>an act of: A) providing power to at least one LED based on a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage (claim 33)</p>	<p>Plain and ordinary meaning</p> <p>It is Signify's position that this is not a steps-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>function: providing power to at least one LED based on a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents</p>	<p>This is a "steps-plus-function" term pursuant to § 112, ¶ 6.</p> <p>function: providing power to at least one LED based on a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</p> <p>structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4</p> <p>(b) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(c) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50</p> <p>and structural equivalents thereof.</p>	<p>Infringement contentions:</p> <p>Ex. E-1, pp. 38-45; Ex. E-2, pp. 46-57; Ex. E-3, pp. 36-44; Ex. E-4, pp. 43-52; Ex. E-5, pp. 33-49; Ex. E-6, pp. 38-45; Ex. E-7, pp. 23-28; Ex. E-8, pp. 59-72; Ex. E-9, pp. 23-27; Ex. E-10, pp. 21-24.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart E-1 at pp. 3-7, 88-89; Chart E-2 at pp. 3-15, 67-68, 75; Chart E-3 at pp. 3-14, 62-63, 67; Chart E-4 at pp. 3-7, 28; Chart E-5 at pp. 4-13, 74-82, 94-95; Chart E-6 at pp. 3-17, 82, 93; Chart E-7 at pp. 4-16, 79, 84; Chart E-8 at p. 5.</p>
---	---	---	--

	<p>thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p>		
<p>an act of: providing power to the at least one LED based on a power-related signal from an alternating current (A.C.) dimmer circuit</p> <p>(claim 34)</p>	<p>Plain and ordinary meaning</p> <p>It is Signify's position that this is not a steps-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>function:</p> <ul style="list-style-type: none"> providing power to at least one LED based on a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage providing power to the at least one LED based on a power-related signal from an 	<p>This is a "steps-plus-function" term pursuant to § 112, ¶ 6.</p> <p>function: providing power to the at least one LED based on a power-related signal from an alternating current (A.C.) dimmer circuit</p> <p>structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4</p> <p>(b) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(c) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the</p>	<p>Infringement contentions:</p> <p>Ex. E-1, pp. 45-48; Ex. E-2, pp. 57-59; Ex. E-3, pp. 44-45; Ex. E-4, pp. 52-55; Ex. E-5, pp. 49-51; Ex. E-6, pp. 45-48; Ex. E-7, pp. 28-29; Ex. E-8, pp. 73-76; Ex. E-9, pp. 27; Ex. E-10, pp. 24-25.</p> <p>Invalidity Contentions: <i>see, e.g.,</i> Chart E-1 at pp. 3-7, 89; Chart E-2 at pp. 15-17, 67-68, 75; Chart E-3 at pp. 14-16, 62-63, 67-68; Chart E-4 at pp. 5-7, 28; Chart E-5 at pp. 13-15, 74-82, 95; Chart E-6 at pp. 17-18, 82, 93-94; Chart E-7 at pp. 16-20, 79, 84; Chart E-8 at pp. 5-6.</p>

	<p>alternating current (A.C.) dimmer circuit</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p>	<p>drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50</p> <p>and structural equivalents thereof.</p>	
--	---	---	--

U.S. Patent No. 7,038,399

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
<p>“controller”</p> <p>(claims 1-5, 7-12, 15, 17, 47-49, 57-60, 62, 63)</p>	<p>Plain and ordinary meaning</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p><u>Claims 1, 3-5</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • provide an essentially non-varying power to the at least one LED over a significant 	<p>This is a “means-plus-function” term pursuant to § 112, ¶ 6.</p> <p><u>Claims 1, 3-5</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • provide an essentially non-varying power to the at least one LED over a significant range of operation of the user interface <p>Structure: the components of rectifier 404, low-pass filter 408 and DC converter 402</p>	<p>Infringement contentions:</p> <p>Ex. F-1, pp. 2-23, 23-26, 26-32, 56-59, 59-60, 61, 61-62; Ex. F-2, pp. 2-30, 30-36, 36-40, 71-74, 74-75, 75-76, 76-77; Ex. F-3, pp. 20-20, 20-25, 26-31, 51-55, 55-57, 57-58; Ex. F-4, pp. 2-27, 28-34, 34-39, 67-68, 69-70, 70-71, 71-72; Ex. F-5, pp. 2-23, 23-30, 30-35, 64-66, 66-67, 67-68, 68-69; Ex. F-6, pp. 2-23, 23-27, 28-33, 59-62, 62-65, 65-66, 66-67, 67-68, 68-69; Ex. F-7, pp. 2-13, 13-16, 16-20, 35-37, 37-38, 38-39, 39-40; Ex. F-8, pp. 17-20, 42, 72-76, 84-86, 87-91, 91-92, 92-93; Ex. F-9, pp. 3-14, 14-16, 16-19, 30-33, 33-34, 35-36; Ex. F-10, pp. 3-13, 13-15, 15-17, 24-26, 28-31; Ex. F-11, pp. 2-21, 22-25, 26-28, 32-33, 33-34, 48-51.</p> <p>Invalidity Contentions: see, e.g., Chart F-1 at pp. 3-37, 43-81, 83-100, 107-117; Chart F-2 at pp. 5-37, 40-71, 84-98;</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>range of operation of the user interface</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as shown in FIGS. 3 and 4 and accompanying discussion in the specification;</p> <p>(b) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(c) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry) and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12,</p>	<p>that are shown in FIG. 4 and structural equivalents thereof.</p> <p><u>Claim 2</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • provide the essentially non-varying power to the at least one LED over a significant range of operation of the user interface notwithstanding variations in the duty cycle of the power-related signal 	<p>Chart F-3 at pp. 4-65, 79-91; Chart F-4 at pp. 5-34, 41-48; Chart F-5 at pp. 5-87, 108-125; Chart F-6 at pp. 5-85, 102-111; Chart F-7 at pp. 5-83, 96-105; Chart F-8 at pp. 1-5, 8-11.</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 2</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • provide the essentially non-varying power to the at least one LED over a significant range of operation of the user interface notwithstanding variations in the duty cycle of the power-related signal <p>Structure: may comprise any of the following:</p>	<p>Structure: the components of rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4</p> <p>and structural equivalents thereof.</p> <p><u>Claim 7</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface • variably control the at least one parameter of the light based at least 	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as shown in FIGS. 3 and 4 and accompanying discussion in the specification;</p> <p>(b) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(c) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry) and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 7</u></p> <p>Functions:</p>	<p>on the variable duty cycle of the power-related signal</p> <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50</p> <p>and structural equivalents thereof.</p> <p><u>Claim 8</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals 	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface • variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and</p>	<p>other than a standard A.C. line voltage</p> <ul style="list-style-type: none"> • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, wherein the at least one parameter of the light that is variably controlled by the at least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light. • variably control the at least one parameter of the light based at least 	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 8</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based 	<p>on the variable duty cycle of the power-related signal.</p> <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50 and either '399 patent at (i) 15:40-56 or (ii) 15:40-56 and 16:6-39 or (iii) 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents thereof.</p> <p><u>Claim 9</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an 	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>on the power-related signal</p> <ul style="list-style-type: none"> • variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal, • variably control the at least one parameter of the light that is variably controlled by the at least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light. <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and</p>	<p>alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</p> <ul style="list-style-type: none"> • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface • variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal • variably control at least two different parameters of the light generated by the at least one LED in response to operation of the user interface <p>Structure: either:</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 9</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based 	<p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50, 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents thereof.</p> <p><u>Claim 10</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based 	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>on the power-related signal</p> <ul style="list-style-type: none"> • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface • variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal • variably control at least two different parameters of the light generated by the at least one LED in response to operation of the user interface <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p>	<p>on the power-related signal</p> <ul style="list-style-type: none"> • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface • variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal • variably control at least two different parameters of the light generated by the at least one LED in response to operation of the user interface • variably control at least an intensity and a color of the light simultaneously in response to operation of the user interface <p>Structure: either:</p> <p>(a) the components of rectifier</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 10</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of 	<p>404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50, 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents thereof.</p> <p><u>Claim 11</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based 	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>light generated by the at least one LED in response to operation of the user interface</p> <ul style="list-style-type: none"> • variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal • variably control at least two different parameters of the light generated by the at least one LED in response to operation of the user interface • variably control at least an intensity and a color of the light simultaneously in response to operation of the user interface <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and</p>	<p>on the power-related signal</p> <ul style="list-style-type: none"> • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface • variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal • variably control at least an intensity and a color temperature of the white light simultaneously in response to operation of the user interface <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 11</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based 	<p>shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50, 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents thereof.</p> <p><u>Claims 12, 14-15</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface 	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>on the power-related signal</p> <ul style="list-style-type: none"> • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface • variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal • variably control at least two different parameters of the light generated by the at least one LED in response to operation of the user interface • variably control at least an intensity and a color temperature of the white light simultaneously in response to operation of the user interface <p>Structure: may comprise any</p>	<ul style="list-style-type: none"> • variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal • variably control at least the intensity and the color temperature of the essentially white light in response to operation of the user interface so as to approximate light generation characteristics of an incandescent light source <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claims 12, 14-15</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals 	<p>drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50, 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents thereof.</p> <p><u>Claim 17</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface <p>Structure: either:</p> <p>(a) the components of rectifier</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>other than a standard A.C. line voltage</p> <ul style="list-style-type: none"> • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface • variably control the at least one parameter of the light based at least on the variable duty cycle of the power-related signal • variably control at least two different parameters of the light generated by the at least one LED in response to operation of the user interface • variably control at least an intensity and a color temperature of the white light simultaneously in 	<p>404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50</p> <p>and structural equivalents thereof.</p> <p><u>Claims 47-48</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) dimmer circuit • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of the essentially white 	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>response to operation of the user interface</p> <ul style="list-style-type: none"> • variably control at least the intensity and the color temperature of the essentially white light in response to operation of the user interface so as to approximate light generation characteristics of an incandescent light source <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p>	<p>light in response to operation of the user interface so as to approximate light generation characteristics of an incandescent light source</p> <ul style="list-style-type: none"> • variably control the at least one parameter of the essentially white light based at least on the variable duty cycle of the power-related signal <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 17</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface <p>Structure: may comprise any of the following:</p>	<p>17:9-50, 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents thereof.</p> <p><u>Claim 49</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) dimmer circuit • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of the essentially white light in response to operation of the user interface so as to approximate light generation characteristics of an incandescent light source • variably control the at least one parameter of the essentially white 	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claims 47-48</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) dimmer circuit • provide power to the at least one LED based 	<p>light based at least on the variable duty cycle of the power-related signal</p> <ul style="list-style-type: none"> • variably control at least an intensity and a color temperature of the essentially white light simultaneously in response to operation of the user interface <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50, 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>on the power-related signal</p> <ul style="list-style-type: none"> • variably control at least one parameter of the essentially white light in response to operation of the user interface so as to approximate light generation characteristics of an incandescent light source • variably control the at least one parameter of the essentially white light based at least on the variable duty cycle of the power-related signal <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown</p>	<p>thereof.</p> <p><u>Claim 57</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive first power from an alternating current (A.C.) dimmer circuit • provide second power to the at least one LED based on the first power • provide the second power as an essentially stable non-varying power to the at least one LED notwithstanding significant variations of the first power <p>Structure: the components of rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4 and structural equivalents thereof.</p> <p><u>Claim 58</u></p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, see '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 49</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive a power-related signal from an alternating current (A.C.) dimmer circuit • provide power to the at least one LED based on the power-related signal • variably control at least one parameter of the essentially white light in response to operation of the user interface so as to 	<p>Functions:</p> <ul style="list-style-type: none"> • receive first power from an alternating current (A.C.) dimmer circuit • provide second power to the at least one LED based on the first power • provide the second power as a varying power to the at least one LED based on variations of the first power <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>approximate light generation characteristics of an incandescent light source</p> <ul style="list-style-type: none"> • variably control the at least one parameter of the essentially white light based at least on the variable duty cycle of the power-related signal • variably control at least an intensity and a color temperature of the essentially white light simultaneously in response to operation of the user interface <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the</p>	<p>17:9-50</p> <p>and structural equivalents thereof.</p> <p><u>Claim 59</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive first power from an alternating current (A.C.) dimmer circuit • provide second power to the at least one LED based on the first power • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 57</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive first power from an alternating current (A.C.) dimmer circuit • provide second power to the at least one LED based on the first power • provide the second power as an essentially stable non-varying power to the at least one LED notwithstanding 	<p>shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50</p> <p>and structural equivalents thereof.</p> <p><u>Claim 60</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive first power from an alternating current (A.C.) dimmer circuit • provide second power to the at least one LED based on the first power • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, wherein the at least one parameter of the light that is variably controlled by the at 	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>significant variations of the first power</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as shown in FIGS. 3 and 4 and accompanying discussion in the specification;</p> <p>(b) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(c) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry) and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12,</p>	<p>least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light</p> <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50 and either '399 patent at (i) 15:40-56 or (ii) 15:40-56 and 16:6-39 or (iii) 15:40-56, 16:6-39 and 20:30-54</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 58</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive first power from an alternating current (A.C.) dimmer circuit • provide second power to the at least one LED based on the first power • provide the second power as a varying power to the at least one LED based on variations of the first power <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the</p>	<p>and structural equivalents thereof.</p> <p><u>Claim 62</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive first power from an alternating current (A.C.) dimmer circuit • provide second power to the at least one LED based on the first power • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, wherein the at least one parameter of the light that is variably controlled by the at least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color 	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 59</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive first power from an alternating current (A.C.) dimmer circuit • provide second power to the at least one LED based on the first power • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface 	<p>temperature of the light, and a temporal characteristic of the light</p> <ul style="list-style-type: none"> • variably control at least an intensity and a color of the light simultaneously in response to operation of the user interface <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50, 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents thereof.</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 60</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive first power from an alternating current (A.C.) dimmer circuit 	<p><u>Claim 63</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive first power from an alternating current (A.C.) dimmer circuit • provide second power to the at least one LED based on the first power • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, wherein the at least one parameter of the light that is variably controlled by the at least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal 	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<ul style="list-style-type: none"> • provide second power to the at least one LED based on the first power • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, wherein the at least one parameter of the light that is variably controlled by the at least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402</p>	<ul style="list-style-type: none"> • characteristic of the light • variably control at least an intensity and a color temperature of the white light simultaneously in response to operation of the user interface <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50, 15:40-56, 16:6-39 and 20:30-54</p> <p>and structural equivalents thereof.</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 62</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive first power from an alternating current (A.C.) dimmer circuit • provide second power to the at least one LED based on the first power 		

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<ul style="list-style-type: none"> • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, wherein the at least one parameter of the light that is variably controlled by the at least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light • variably control at least an intensity and a color of the light simultaneously in response to operation of the user interface <p>Structure: may comprise any of the following:</p>		

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 63</u></p> <p>Functions:</p> <ul style="list-style-type: none"> • receive first power from an alternating current (A.C.) dimmer circuit • provide second power to the at least one LED 		

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>based on the first power</p> <ul style="list-style-type: none"> • variably control at least one parameter of light generated by the at least one LED in response to operation of the user interface, wherein the at least one parameter of the light that is variably controlled by the at least one controller in response to operation of the user interface includes at least one of an intensity of the light, a color of the light, a color temperature of the light, and a temporal characteristic of the light • variably control at least an intensity and a color temperature of the white light simultaneously in response to operation of the user interface 		

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p>		
<p>“alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage” (claims 1, 7, 17, 30, 34)</p>	<p>power source that provides two or more alternating current (A.C.) signals, each being other than a sinusoidal wave at a standard frequency</p>	<p>A.C. power source that provides two or more A.C. signals but does not provide standard A.C. line voltage.</p>	<p>Infringement contentions: Ex. Ex. F-1, pp. 3-7, 26-32, 38-54; Ex. F-2, pp. 3-6, 36-37, 46-57; Ex. F-3, pp. 2-6, 25-26, 35-43; Ex. F-4, pp. 3-6, 34-35,</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	and amplitude		<p>44-53; Ex. F-5, pp. 4-7, 30, 43-52; Ex. F-6, pp. 3-6, 28, 41-48, 59-60; Ex. F-7, pp. 3-6, 17, 24-29; Ex. F-8, pp. 4-8, 42, 59-72; Ex. F-9, pp. 4-8, 16-17, 23-27; Ex. F-10, pp. 3-8, 15, 21-24; Ex. F-11, pp. 2-12, 35-40, 48-49.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart F-1 at pp. 3-7, 48-53, 85-86, 101-102, 104; Chart F-2 at pp. 5-15, 42, 64, 78-79, 81; Chart F-3 at pp. 4-14, 39, 58, 73, 75; Chart F-4 at pp. 5-7, 12, 33, 35-36, 38; Chart F-5 at pp. 5-13, 53, 73-74, 99-100, 103; Chart F-6 at pp. 5-17, 47-48, 84, 96, 98-99; Chart F-7 at pp. 5-16, 44, 81-82, 90, 92; Chart F-8 at pp. 1-4, 6.</p>
<p>“A.C. Dimmer Circuit” / “(A.C.) dimmer circuit” / “alternating current (A.C.) dimmer circuit” (claims 1, 4, 7, 14, 17, 30, 34, 47, 48, 57, 58, 59)</p>	<p>a circuit that provides an alternating current (A.C.) dimming signal</p>	<p>Plain meaning</p>	<p>Infringement contentions: Ex. F-1, pp. 10-14, 26-32, 38-54, 57, 59-60, 61; Ex. F-2, pp. 14-17, 37, 57-59, 72, 74-75, 75-76; Ex. F-3, pp. 10-16, 25-26, 43-25, 53-55, 55-57; Ex. F-4, pp. 13-16, 35-39, 53-56, 67, 69-70, 70-71; Ex. F-5, pp.</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
			<p>11-13, 30-31, 50-52, 64, 66, 68; Ex. F-6, pp. 10-11, 28-33, 48-52, 60-62, 66-67, 67-68; Ex. F-7, pp. 8-10, 17, 29-30, 35-36, 37-38, 38-39; Ex. F-8, pp. 17-20, 42, 72-76, 84-85, 87-88, 90-91, 91-92; Ex. F-9, pp. 8-12, 17, 27, 30-31, 33-34, 35; Ex. F-10, pp. 8-12, 15, 24-25, 28-29; Ex. F-11, pp. 14-17, 40-44, 48-51.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart F-1 at pp. 8-11, 37-43, 53-59, 81-83, 86-87, 102, 104-105, 107-109, 110-114; Chart F-2 at pp. 15-23, 37-40, 43, 63, 64-65, 79, 81, 85-96; Chart F-3 at pp. 14-23, 36-37, 39-40, 57-59, 73-74, 76, 79-86; Chart F-4 at pp. 7-8, 11-19, 32-34, 36, 38, 41-46; Chart F-5 at pp. 13-22, 48-49, 54-59, 72, 74, 100, 103-104, 109-119; Chart F-6 at pp. 17-25, 45-46, 48-66, 83-85, 96-97, 99, 102-109; Chart F-7 at pp. 16-28, 43-60, 80-82, 90, 93, 96-102; Chart F-8 at pp. 2, 4, 6-10.</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
<p>“power circuitry” (claims 17, 18)</p>	<p>Plain and ordinary meaning</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Function: provide at least the power to the at least one LED based on the varying power-related signal</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> ’138 patent at 3:12-4:19,</p>	<p>This is a “means-plus-function” term pursuant to § 112, ¶ 6.</p> <p>Function: provide at least the power to the at least one LED based on the varying power-related signal</p> <p>Structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4</p> <p>(b) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(c) the components of power circuitry 108 that are shown in FIG. 8</p> <p>and structural equivalents thereof.</p>	<p>Infringement contentions: Ex. F-1, pp. 31-32, 32-34; Ex. F-2, pp. 39-40, 41-42; Ex. F-3, pp. 30-31, 31-32; Ex. F-4, pp. 38-39, 39-40; Ex. F-5, pp. 34-35, 35-37; Ex. F-6, pp. 33-34, 34-35; Ex. F-7, pp. 19-20, 20-21; Ex. F-8, pp. 48-51, 51-54; Ex. F-9, pp. 18-19, 19-20; Ex. F-10, pp. 16-17, 17-18.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart F-1 at pp. 89-101; Chart F-2 at pp. 70-75; Chart F-3 at pp. 64-65; Chart F-4 at pp. 13-19, 34-35; Chart F-5 at pp. 79-87; Chart F-6 at pp. 48-57, 85-86; Chart F-7 at pp. 45-52, 83; Chart F-8 at p. 5.</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.		
“adjustment circuit” (claims 17, 19)	<p>Plain and ordinary meaning</p> <p>It is Signify’s position that this is not a means-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>Function: variably control the at least one parameter of light based on the varying power-related signal</p> <p>Structure: adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification and/or structural equivalents thereof.</p>	<p>This is a “means-plus-function” term pursuant to § 112, ¶ 6</p> <p>Function: variably control the at least one parameter of light based on the varying power-related signal</p> <p>Structure: the components of adjustment circuit 208 that are shown in FIG. 6</p> <p>and structural equivalents thereof.</p>	<p>Infringement contentions: Ex. F-1, pp. 27-31, 37-38; Ex. F-2, pp. 38-39, 46; Ex. F-3, pp. 26-30, 35; Ex. F-4, pp. 35-38, 44; Ex. F-5, pp. 31-34, 42; Ex. F-6, pp. 28-33, 38-40; Ex. F-7, pp. 17-19, 23; Ex. F-8, pp. 43-48, 51-52; Ex. F-9, pp. 17-18, 22-23; Ex. F-10, pp. 16, 21.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart F-1 at pp. 87-89, 101; Chart F-2 at pp. 65-70, 76-78; Chart F-3 at pp. 59-64, 70-73; Chart F-4 at pp. 13-19, 34-35; Chart F-5 at pp. 75-79, 97-99; Chart F-6 at pp. 85, 91-96; Chart F-7 at pp. 82-83, 88-90; Chart F-8 at pp. 4-6.</p>
an act of: A) providing power to at least one LED based on a power-related signal from an alternating current (A.C.) power source that provides signals other	<p>Plain and ordinary meaning</p> <p>It is Signify’s position that this is not a steps-plus-function term governed by § 112, ¶ 6. To the extent that the</p>	<p>This is a “steps-plus-function” term pursuant to § 112, ¶ 6</p> <p>function: providing power to at least one LED based on a power-related signal from an</p>	<p>Infringement contentions: Ex. F-1, pp. 38-45; Ex. F-2, pp. 46-57; Ex. F-3, pp. 35-43; Ex. F-4, pp. 44-53; Ex. F-5, pp. 43-50; Ex. F-6, pp. 41-48;</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
<p>than a standard A.C. line voltage (claims 30, 34)</p>	<p>Court finds that the term is governed by § 112, ¶ 6:</p> <p>function: providing power to at least one LED based on a power-related signal from an alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</p> <p><u>Claim 30</u></p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as shown in FIGS. 3 and 4 and accompanying discussion in the specification;</p> <p>(b) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(c) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the</p>	<p>alternating current (A.C.) power source that provides signals other than a standard A.C. line voltage</p> <p><u>Claim 30</u></p> <p>structure: the components of rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4 and structural equivalents thereof.</p> <p><u>Claim 34</u></p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50</p> <p>and structural equivalents</p>	<p>Ex. F-7, pp. 24-29; Ex. F-8, pp. 59-72; Ex. F-9, pp. 23-27; Ex. F-10, pp. 21-24; Ex. F-11, pp. 35-37.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart F-1 at pp. 3-7, 101-102, 104; Chart F-2 at pp. 3-15, 70-71, 79, 81; Chart F-3 at pp. 3-14, 64-65, 73, 75; Chart F-4 at pp. 3-7, 35, 38; Chart F-5 at pp. 4-13, 79-87, 99-100, 103; Chart F-6 at pp. 3-17, 85, 96, 98-99; Chart F-7 at pp. 4-16, 83, 90, 92; Chart F-8 at p. 6.</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>drive circuitry) and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 34</u></p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p>	thereof.	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p>		
<p>an act of: providing power to the at least one LED based on a power-related signal from an alternating current (A.C.) dimmer circuit</p> <p>(claims 30, 34)</p>	<p>Plain and ordinary meaning</p> <p>It is Signify's position that this is not a steps-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>function: providing power to the at least one LED based on a power-related signal from an alternating current (A.C.) dimmer circuit</p> <p><u>Claim 30</u></p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as shown in FIGS. 3 and 4 and accompanying</p>	<p>This is a "steps-plus-function" term pursuant to § 112, ¶ 6</p> <p>function: providing power to the at least one LED based on a power-related signal from an alternating current (A.C.) dimmer circuit</p> <p><u>Claim 30</u></p> <p>structure: the components of rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4</p> <p>and structural equivalents thereof.</p> <p><u>Claim 34</u></p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in</p>	<p>Infringement contentions:</p> <p>Ex. F-1, pp. 45-48; Ex. F-2, pp. 57-59; Ex. F-3, pp. 43-45; Ex. F-4, pp. 53-55; Ex. F-5, pp. 50-52; Ex. F-6, pp. 48-52; Ex. F-7, pp. 29-30; Ex. F-8, pp. 72-76; Ex. F-9, pp. 27; Ex. F-10, pp. 24; F-11, pp. 37-40.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart F-1 at pp. 8, 102, 104; Chart F-2 at pp. 15-17, 79, 81; Chart F-3 at pp. 14-16, 73, 76; Chart F-4 at p. 7, 36, 38; Chart F-5 at pp. 13-15, 100, 103-104; Chart F-6 at pp. 17-18, 96, 99; Chart F-7 at pp. 16-20, 90, 93; Chart F-8 at p. 6.</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>discussion in the specification;</p> <p>(b) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(c) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry) and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p> <p><u>Claim 34</u></p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass</p>	<p>FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50</p> <p>and structural equivalents thereof.</p>	

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p>		
<p>an act of: B) providing an essentially non-varying power to the at least one LED over a significant range of operation of the user interface</p> <p>(claim 30)</p>	<p>Plain and ordinary meaning</p> <p>It is Signify's position that this is not a steps-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is</p>	<p>This is a "steps-plus-function" term pursuant to § 112, ¶ 6</p> <p>function: providing an essentially non-varying power to the at least one LED over a significant range of operation</p>	<p>Infringement contentions: Ex. F-11, pp. 41-44.</p> <p>Invalidity Contentions: <i>see</i>, e.g., Chart F-1 at pp. 10-11, 102; Chart F-2 at pp. 23-28, 79; Chart F-3 at pp. 23-27, 74; Chart F-4 at pp. 8-10, 36;</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>governed by § 112, ¶ 6:</p> <p>function: providing an essentially non-varying power to the at least one LED over a significant range of operation of the user interface</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as shown in FIGS. 3 and 4 and accompanying discussion in the specification;</p> <p>(b) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(c) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry) and accompanying discussion in the specification;</p> <p>and/or structural equivalents</p>	<p>of the user interface</p> <p>structure: the components of rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4</p> <p>and structural equivalents thereof.</p>	<p>Chart F-5 at pp. 22-25, 100-101; Chart F-6 at pp. 25-30, 97; Chart F-7 at pp. 28-33, 91.</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p>		
<p>an act of: providing the essentially non-varying power to the at least one LED over a significant range of operation of the user interface notwithstanding variations in the duty cycle of the power-related signal</p> <p>(claim 31)</p>	<p>Plain and ordinary meaning</p> <p>It is Signify's position that this is not a steps-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>function: providing the essentially non-varying power to the at least one LED over a significant range of operation of the user interface notwithstanding variations in the duty cycle of the power-related signal</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as shown in FIGS. 3 and 4 and accompanying</p>	<p>This is a "steps-plus-function" term pursuant to § 112, ¶ 6</p> <p>function: providing the essentially non-varying power to the at least one LED over a significant range of operation of the user interface notwithstanding variations in the duty cycle of the power-related signal</p> <p>structure: the components of rectifier 404, low-pass filter 408 and DC converter 402 that are shown in FIG. 4 and structural equivalents thereof.</p>	<p>Infringement contentions: Ex. F-11, pp. 45.</p> <p>Invalidity Contentions: <i>see, e.g.</i>, Chart F-1 at pp. 10-11, 14, 103; Chart F-2 at pp. 23-28, 30-31, 80; Chart F-3 at pp. 23-27, 30, 74; Chart F-4 at pp. 8-10, 37; Chart F-5 at pp. 22-25, 28, 101-102; Chart F-6 at pp. 25-30, 33, 97-98; Chart F-7 at pp. 28-33, 35, 91.</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>discussion in the specification;</p> <p>(b) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(c) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry) and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p>		
act[] of . . . providing the essentially non-varying power based on the filtered rectified power-related signal	<p>Plain and ordinary meaning</p> <p>It is Signify's position that this is not a steps-plus-</p>	<p>This is a "steps-plus-function" term pursuant to § 112, ¶ 6</p> <p>function: providing the essentially non-varying power based on the filtered rectified</p>	<p>Infringement contentions: Ex. F-11, pp. 46-47</p> <p>Invalidity Contentions: <i>see</i>, e.g., Chart F-1 at pp. 29-37, 104; Chart F-2 at pp. 34-37,</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
(claim 32)	<p>function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>function: providing the essentially non-varying power based on the filtered rectified power-related signal</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408 and DC converter 402 as shown in FIGS. 3 and 4 and accompanying discussion in the specification;</p> <p>(b) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(c) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry) and accompanying discussion in</p>	<p>power-related signal</p> <p>structure: DC converter 402 (Fig. 4)</p>	<p>80-81; Chart F-3 at pp. 32-36, 75; Chart F-4 at pp. 11, 37; Chart F-5 at pp. 39-48, 102-103; Chart F-6 at pp. 40-45, 98; Chart F-7 at pp. 39-43, 92.</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>the specification; and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p>		
<p>an act of: C) variably controlling at least one parameter of light generated by the at least one LED in response to operation of the user interface (claim 34)</p>	<p>Plain and ordinary meaning</p> <p>It is Signify's position that this is not a steps-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>function: variably controlling at least one parameter of light generated by the at least one LED in response to operation of the user interface</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and</p>	<p>This is a "steps-plus-function" term pursuant to § 112, ¶ 6</p> <p>function: variably controlling at least one parameter of light generated by the at least one LED in response to operation of the user interface</p> <p>structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the</p>	<p>Infringement contentions: Ex. F-1, pp. 48-51; Ex. F-2, pp. 59-65; Ex. F-3, pp. 45-48; Ex. F-4, pp. 56-62; Ex. F-5, pp. 52-59; Ex. F-6, pp. 52-54; Ex. F-7, pp. 30-32; Ex. F-8, pp. 76-77; Ex. F-9, pp. 27-28; Ex. F-10, pp. 25.</p> <p>Invalidity Contentions: <i>see</i>, e.g., Chart F-1 at pp. 56-59, 105; Chart F-2 at pp. 43-48, 82; Chart F-3 at pp. 40-47, 76; Chart F-4 at pp. 13-19, 38; Chart F-5 at pp. 54-60, 104; Chart F-6 at pp. 57-66, 99; Chart F-7 at pp. 52-60, 93; Chart F-8 at p. 7.</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p>	<p>drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50</p> <p>and structural equivalents thereof.</p>	
<p>an act of: D) variably controlling the at least one parameter of the light based at least on the variable duty cycle of the power-related signal</p> <p>(claim 34)</p>	<p>Plain and ordinary meaning</p> <p>It is Signify's position that this is not a steps-plus-function term governed by § 112, ¶ 6. To the extent that the Court finds that the term is governed by § 112, ¶ 6:</p> <p>function: variably controlling the at least one parameter of the light based at least on the variable duty cycle of the</p>	<p>This is a "steps-plus-function" term pursuant to § 112, ¶ 6</p> <p>function: variably controlling the at least one parameter of the light based at least on the variable duty cycle of the power-related signal</p> <p>structure: either:</p> <p>(a) the components of rectifier 404, low-pass filter 408, DC</p>	<p>Infringement contentions:</p> <p>Ex. F-1, pp. 52-54; Ex. F-2, pp. 66-68; Ex. F-3, pp. 48-50; Ex. F-4, pp. 62-64; Ex. F-5, pp. 59-61; Ex. F-6, pp. 54-57; Ex. F-7, pp. 32-34; Ex. F-8, pp. 78-82; Ex. F-9, pp. 28; Ex. F-10, pp. 25-26.</p> <p>Invalidity Contentions: <i>see, e.g.,</i> Chart F-1 at pp. 59-64, 105; Chart F-2 at pp. 43-49,</p>

Disputed Claim Term or Phrase	Plaintiffs' Proposed Construction	Defendant's Proposed Construction	Cross References
	<p>power-related signal</p> <p>Structure: may comprise any of the following:</p> <p>(a) rectifier 404, low-pass filter 408, DC converter 402 and adjustment circuit 208 as shown in FIGS. 5 and 6 and accompanying discussion in the specification;</p> <p>(b) controller 204B as shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry); and accompanying discussion in the specification;</p> <p>and/or structural equivalents thereof.</p> <p>As a non-limiting example, <i>see</i> '138 patent at 3:12-4:19, 6:28-7:35, 10:49-11:12, 11:24-64, 12:25-23:4, 24:62-28:26, Figs. 3-8.</p>	<p>converter 402 and adjustment circuit 208 that are shown in FIG. 6; or</p> <p>(b) the components of controller 204B that are shown in FIG. 7, FIG. 8 (for the power circuitry) and either FIGS. 9 or 10 or 11 (for the drive circuitry), wherein the processor 102 is programmed according to '399 patent at 17:9-50</p> <p>and structural equivalents thereof.</p>	<p>82; Chart F-3 at pp. 40-47, 77; Chart F-4 at pp. 13-19, 39; Chart F-5 at pp. 54-60, 105; Chart F-6 at pp. 57-66, 100; Chart F-7 at pp. 52-60, 94; Chart F-8 at p. 7.</p>